

Exhibit Q

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Chris Daniel - District Clerk
Harris County
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By: Furshilla McGee

Cause No. 2011-43161

RICHARD D. RODE)	IN THE DISTRICT COURT
)	
Plaintiff,)	
)	
v.)	125th JUDICIAL DISTRICT
)	
HOMECOMINGS FINANCIAL, LLC and)	
GMAC MORTGAGE, LLC,)	
)	HARRIS COUNTY, TEXAS
Defendants.)	

DEFENDANTS' ANSWER
TO PLAINTIFF'S ORIGINAL PETITION

COME NOW Defendants Homecomings Financial, LLC and GMAC Mortgage, LLC (collectively, "Defendants") and respond as follows to Plaintiff's Original Petition:

I. GENERAL DENIAL

Subject to and without waiving any defenses, Defendants deny each and every, all and singular, allegations in the Original Petition, or any subsequent petition filed on behalf of Plaintiff in this cause, and demand that Plaintiff make strict proof thereof at the time of trial.

II. AFFIRMATIVE DEFENSES

1. Defendants plead the affirmative defenses of Statute of Frauds, statute of limitations, parol evidence, accord and satisfaction, estoppel, justification, payment, release, waiver, and all other matters that constitute an avoidance or affirmative defense.

2. Defendants reserve the right, as discovery progresses, to assert any and all defenses that may be made known to them.

Respectfully submitted,

/s/ Graham Gerhardt

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2011, I served a copy of the foregoing via the Court's electronic filing system and by facsimile to the following:

Jeffrey H. Uzick
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/s/ Graham Gerhardt

OF COUNSEL